

**FOR THE WESTERN DISTRICT OF TENNESSEE  
WESTERN DIVISION**

FILED BY  D.C.

05 OCT 19 PM 4:00

## LILLY LEWIS,

**Plaintiff.**

V<sub>1</sub>

## **MEMPHIS FINANCIAL SERVICES, et al.,**

## **Defendants-**

THOMAS M. GOULD  
CLERK, U.S. DISTRICT COURT  
W/D OF TN, MEMPHIS

No. 05-2524 D/AH

**PLAINTIFF'S PROPOSED RULE 16(b) SCHEDULING ORDER**

Pursuant to the scheduling conference set by written notice, the following dates are proposed dates for:

**INITIAL DISCLOSURES (Rule 26(a)(1)): November 3, 2005;**

**JOINING PARTIES:** December 20, 2005

**AMENDING PLEADINGS:** December 20, 2005

**COMPLETING ALL DISCOVERY:** June 20, 2006

**(a) REQUESTS FOR PRODUCTION, INTERROGATORIES and  
REQUESTS FOR ADMISSIONS:**

March 10, 2006

**(b) EXPERT DISCLOSURE (Rule 26(a)(2))**

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- (i) PLAINTIFF'S EXPERTS:  
April 24, 2006
- (ii) DEFENDANTS' EXPERTS:  
May 24, 2006
- (iii) SUPPLEMENTATION UNDER Rule 26(e):  
August 5, 2006

(c) DEPOSITION OF EXPERTS:  
July 20, 2006

**FILING DISPOSITIVE MOTIONS:**

August 20, 2006

**FINAL LISTS OF WITNESSES AND EXHIBITS (Rule 26(a)(3)):**

- (a) for Plaintiff: 45 days before trial
- (b) for Defendants: 30 days before trial

Parties shall have ten (10) days after service of the final lists of witnesses and exhibits to file objections under Rule 26(a)(3).

The trial of this matter is expected to last 7-10 days. The presiding judge will set this matter for Jury Trial. In the event the parties are unable to agree on a joint pre-trial order, the parties must notify the Court at least ten (10) days before trial.

**OTHER RELEVANT MATTERS:**

Interrogatories, Requests for Production and Requests for Admissions must be submitted to the opposing party in sufficient time for the opposing party to respond by the deadline for completion of discovery. For example, if the FRCP allow 30 days for a party to respond, then the discovery must be submitted at least 30 days prior to the deadline for completion of discovery.

Motions to compel discovery are to be filed and served by the discovery deadline or within 30 days of the default or the service of the response, answer, or objection, which is the subject of the motion if the default occurs within 30 days of the discovery

deadline, unless the time for filing of such motion is extended for good cause shown, or any objection to the default, response, answer, or objection shall be waived.

The parties are reminded that pursuant to Local Rule 7(a)(1)(A) and (A)(1)(B), all motions, except motions pursuant to FRCP 12, 56, 59, and 60 shall be accompanied by a proposed Order and a Certificate of Consultation.

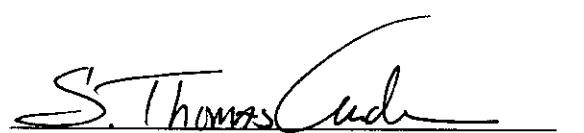
The opposing party may file a response to any motion filed in this matter. Neither party may file an additional reply, however, without leave of court. If a party believes that a reply is necessary, it shall file a motion for leave to file a reply accompanied by a memorandum setting forth the reasons for which a reply is required.

The parties may consent to trial before the Magistrate Judge. The Magistrate judge can normally provide the parties with a definite trial date that will not be continued unless a continuance is agreed to by all parties, or an emergency arises which precludes the matter from proceeding to trial.

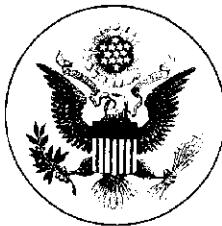
***The parties are encouraged to engage in court-annexed attorney mediation or private mediation on or before the close of discovery.***

This order has been entered after consultation with trial counsel pursuant to notice. Absent good cause shown, the scheduling dates set by this order will not be modified or extended.

**IT IS SO ORDERED.**

  
\_\_\_\_\_  
S. THOMAS ANDERSON  
UNITED STATES MAGISTRATE JUDGE

DATE: October 19, 2005



# Notice of Distribution

This notice confirms a copy of the document docketed as number 34 in case 2:05-CV-02524 was distributed by fax, mail, or direct printing on October 20, 2005 to the parties listed.

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Honorable Bernice Donald  
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